

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>IN RE:</b>	:	CHAPTER 13
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<b>DAISY HURTADO,</b>	:	CASE NO. 18-12234
	:	
<b>DEBTOR.</b>	:	HON. ASHELY M. CHAN
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**STIPULATION AND CONSENT ORDER PERMITTING  
LATE FILED CLAIM OF GELT PROPERTIES, LLC, AS  
SUCCESSOR-BY-MERGER OF GELT FINANCIAL CORPORATION**

**WHEREAS**, on April 2, 2018, Debtor filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code in the Eastern District of Pennsylvania, designated as Case No. 18-12234; and

**WHEREAS**, Debtor failed to include Gelt Properties, LLC, as successor-by-merger of Gelt Financial Corporation (“Gelt”) on the creditor matrix; and

**WHEREAS**, the filing deadline for creditors to file a Proof of Claim was June 11, 2018; and

**WHEREAS**, Gelt did not receive timely notice of these bankruptcy proceedings; and

**WHEREAS**, Debtor will be filing amended Schedules and Plan to address the claim of Gelt; and

**WHEREAS**, in lieu of filing a Motion, the parties have agreed to permit the untimely claim of Gelt;

**WHEREAS**, this submittal is upon notice to the appointed Chapter 13 Trustee; and

**NOW THEREFORE**, the parties having conferred and agreed upon the terms of this Order, and for good cause shown, it is hereby:

**ORDERED** that Gelt Properties, LLC shall file a Proof of Claim by August 27, 2018; and  
it is further

**ORDERED** that the Proof of Claim of Gelt will be deemed timely filed;

**BY THE COURT:**



**Date: August 27, 2018**

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Honorable Ashely M. Chan  
United States Bankruptcy Judge

The undersigned hereby consent  
to the form, entry and substance  
of the within Consent Order:

**JENSEN BAGNATO, P.C.**

By: /s/ Erik B. Jensen  
Erik B. Jensen, Esquire  
Attorney for Debtor,  
Daisy Hurtado

Dated: August 24, 2018

**EISENBERG, GOLD & AGRAWAL, P.C.**

By: /s/ Andrew L. Unterlack  
Andrew L. Unterlack, Esquire  
Attorneys for Creditor,  
Gelt Properties, LLC

Dated: August 24, 2018